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April 13, 2004

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for Triisopropylborate

Dear Administrator Leavitt:

The following comments on DuPont's test plan for the chemical Triisopropylborate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

E.I. du Pont de Nemours & Company, Inc. submitted its test plan on December 13, 2003, for the chemical Triisopropylborate (CAS No. 5419-55-6), also known as TIPB. This substance is used in the synthesis of pharmaceuticals and as a lubricant additive. Existing data for a substantial number of ecotoxicity studies and a few mammalian toxicity studies have been compiled by DuPont and we commend this approach for assessing hazard and exposure risk for HPV chemicals. We are also pleased to see that DuPont has described TIPB as being unstable in water and immediately hydrolyzes to boric acid and isopropanol and therefore, support DuPont's proposal to conduct a hydrolytic stability test, OECD 111.

At this time, however, we question DuPont's assessment that a combined repeated dose/reproduction/developmental toxicity test (OECD 422) is needed to meet the requirements of the HPV program. If conducted, this test will result in the death of at least 675 animals.

We expect that the proposed hydrolytic stability test will show that TIPB immediately hydrolyzes to boric acid and isopropanol. We recommend the OECD 111 study be conducted at a pH appropriate to the stomach conditions of mammals. We believe this will demonstrate that TIPB is, in fact, rapidly hydrolyzed and any toxic effects in mammals (chemical delivery by gavage), would be due to the component parts of TIPB, not the parent chemical. Extensive published data is available for repeated dose, reproductive, and developmental toxicity for both boric acid and isopropanol, eliminating the need for the proposed OECD 422 study.

We are hopeful that DuPont will reconsider their proposal to kill 675 animals in a combined repeated dose/reproductive/developmental toxicity test that may be completely irrelevant. We also appreciate the comments submitted by Environmental Defense regarding this issue. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research